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Title:

Comments: As part of the NEPA process, it's essential to highlight my opposition to the Forest Service's indiscriminate cutting of older forests driven by volume-based timber targets. Older forests are vital for biodiversity, carbon sequestration, and habitat preservation It's concerning that the Forest Service is placing the timber volume mandate above other critical forest needs like recreation, forest health, and water quality. By prioritizing timber targets, the agency risks undermining the overall well-being of our forests and the communities that rely on them. The Forest Service's analysis of landslide risks in the Jellico Mountains does not address the most relevant issues related to this significant hazard. Given the steep and landslide-prone nature of these mountains, it's crucial for comprehensive assessments to be conducted. I urge the Forest Service to take a deeper look at the landslide risks and the serious issues raised by Kentucky Heartwood. By prioritizing thorough analysis and incorporating additional expert guidance, we can better safeguard against landslide risks and ensure the safety and stability of the Jellico mountains and surrounding areas. Regeneration cuts, such as clearcuts and shelterwood logging, in mature and old-growth forests has no place in the Jellico Mountains. These practices pose a significant threat to the crucial role mature and old growth forests play in mitigating climate change, as emphasized in President Biden's Executive Order. The best available climate science unequivocally demonstrates the importance of mature and old-growth forests for climate change mitigation. These forests act as essential carbon sinks, helping to absorb and store significant amounts of carbon dioxide from the atmosphere. By acknowledging this science, the USFS should align its practices with broader conservation objectives and contribute meaningfully to climate action efforts. It's imperative that the Forest Service adheres to the Forest Plan and provides a clear explanation of how they intend to maintain the 7,400 acres of habitat required by Cerulean Warblers in the Jellicos. These habitats are essential for the survival and well-being of these species, and it's critical that they are preserved and protected. By removing regeneration cuts from the project scope and focusing on critical Cerulean Warbler habitat, as mentioned in Objective 1.1.B of the Forest Plan, the Forest Service can demonstrate its commitment to conservation and the broader goals of preserving biodiversity and ecosystem health. I strongly support the protection of the bats in the Jellico project area. This region is a critical habitat for the Indiana bat (Myotis sodalis) and the Northern long-eared bat (Myotis septentrionalis), both of which are endangered under the Endangered Species Act (ESA). Additionally, the Tricolored bat (Perimyotis subflavus), which is proposed for listing under the ESA, also resides in this area. Preserving their habitat is essential for the survival and recovery of these vulnerable species. I URGE the FS to prioritize the protection of endangered and threatened species within the Jellico project area. This region includes a substantial portion of the designated critical habitat for the federally endangered Cumberland darter (Etheostoma susanae) and habitat for the federally threatened blackside dace (Chrosomus cumberlandensis). These species are found only in the high-quality streams of the Cumberland Plateau, making them biological jewels of Kentucky. The U.S. Fish and Wildlife Service has highlighted that current land use practices, such as agriculture, residential development, logging, and surface coal mining, continue to impact sediment and water discharges into streams, further threatening the habitat of the blackside dace. It is crucial to protect these habitats to ensure the survival and recovery of these unique and vulnerable species. A delicate population of a federally-listed endangered mussel, the Cumberland Elktoe (Alasmidonta atropurpurea), has been identified in Jellico Creek. This is one of several populations which the US Fish and Wildlife Service describes as likely having low resiliency due to its small and isolated population. One of the threats to this mussel species is excessive sedimentation from resource extraction. No comprehensive surveys have been conducted in Jellico Creek since 2005, making a full survey of the area absolutely necessary before logging. Please make this survey a requirement in the next phase of this proposal. The Draft EA's analysis of the rampant Tree of Heaven infestation in the Jellicos is grossly understated. Large infestations, particularly stemming from areas previously logged by the Forest Service in the 1990s, pose a significant risk of spread with the proposed logging activities.